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Docket Office
California Energy Commission
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5512

Subject: Docket No. 04-AAER-1

Maytag Corporation is a leading producer of home and commercial appliances sold throughout North America and in International markets. The corporation's Hoover Floor Care division is the market leader in North American floor care products. These comments address Maytag's concerns about the California Energy Commission's proposed regulations for External Power Supplies. Maytag strongly encourages the CEC to recognize the differences between external power supplies and battery chargers, and requests that the CEC exempt appliance battery chargers from regulation until an appropriate test procedure and regulation can be developed.

An External Power Supply is a power conversion product that changes standard power line voltage to a lower amount in order to drive electronics. A Battery Charger is a power conversion product that converts standard power line voltage and current to a lower amount, in order to slowly charge re-chargeable batteries. Most battery chargers are made up of components in an external box (transformer) as well as electronic circuitry in the product.

Under the current draft regulations, the CEC has lumped battery chargers for appliances and tools, which primarily use nickel cadmium (NiCd) batteries, with external power supplies. The proposed regulation does not account for the distinction between components and is designed to measure only one part of the battery charger and not the efficiency of the battery charger as a unit. A proper Battery Charger efficiency test procedure must measure efficiency in all modes of the battery charging sequence, not just the output of the external box.

The test procedure used by the CEC in the proposed regulation is based on a rejected procedure considered by the U.S. EPA ENERGY STAR® Program. EPA has recognized that this procedure is not appropriate and has decided to develop a test procedure that effectively measures the energy consumption of appliance battery chargers.

This regulation could effectively discontinue the use of transformer-based power supplies and battery chargers when a cost-effective alternative does not exist. In fact, the cost increases for some alternative chargers are 100% to 400% higher than transformer-based products. While proponents of this regulation mention the wide availability and usage of IC or semi-conductor chargers, these chargers are confined to products like laptop computers and other high-priced electronics. The result of this regulation will mean higher costs for manufacturers and consumers, with little impact on energy consumption.

We encourage the Commission to reconsider its definition of "External Power Supply." We will work with AHAM to develop a test procedure that effectively measures the energy consumption of battery chargers and we hope the Commission will pursue a separate standard for battery chargers based on an appropriate test method.

Thank you for your consideration of these comments as you complete the rulemaking process for external power supplies. Please contact me if you have any question pertaining to this issue.

Sincerely,

Greg Bilek
Manager-Category Support
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Hoover/Maytag